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*Comment Received From: Donald Priest
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Opposition to Soda Mountain Solar Project Due to Conservation and Recreational Concerns

Additional submitted attachment is included below.



February 15, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Opposition to Soda Mountain Solar Project Due to Conservation and Recreational Concerns

Commissioners,

Our coalition of wildlife conservation organizations hereby express our opposition to the proposed Soda Mountain Solar Project (Project), which would be disastrous to our varied and iconic California desert wildlife species. The Project will have significant effects on our desert's delicate ecosystem, and will undermine current conservation efforts to restore and enhance our desert lands by the California Department of Fish and Wildlife, California Department of Transportation, other State and Federal Agencies, Indian Tribes and the NGO stakeholders.

The Project is proposed within and directly adjacent to critical essential wildlife corridors, Desert Bighorn Sheep (DBS) and other wildlife habitat, posing unacceptable risks. This region of the California desert, that includes the Mojave National Preserve, is not merely public land, but a

living legacy - a place where generations of Californians have recreated, observed wildlife and participated in sportsman's activities. This Project would disrupt those activities by Californians and our responsible land stewardship heritage.

Our concerns are grounded in both conservation science and our commitment to preserving outdoor traditions:

Irreversible Ecological Damage: The potential avoidance behavior by DBS populations induced by the Project will reduce genetic connectivity among local herds, increasing their vulnerability to extinction and climate change. The Project's footprint on and near seasonal foraging sites would also reduce or eliminate access and connectivity to critical food and water sources that is essential for DBS and early lamb survival.

Wildlife Corridors and Habitat: The Project site is adjacent to a legislatively required key wildlife overpass across Interstate 15 (I-15) that is currently under development to mitigate the significant population fragmentation to DBS and other wildlife species by the recently permitted Brightline West High-Speed Rail project. Should the Project proceed, the overpass across I-15 may fail to be used by DBS, thereby precluding DBS movements between habitat north and south of that freeway, effectively wasting years of planning and significant financial investment by government agencies and private stakeholders. Please see attached a summary Report 'Potential impacts of the Soda Mountain Solar development on desert bighorn sheep' by Dr. Christina M. Aiello and Dr. Clinton W. Epps of Oregon State University's Department of Fisheries, Wildlife, and Conservation Sciences. That Report clearly projects that this Project will directly impact DBS movements.

Recreation and Sportsmen's Opportunities: DBS and other wildlife are integral to the cultural and economic fabric of our desert communities. Wildlife viewing and sportsmen's activities have long been pillars of our rural traditions, and any harm to DBS and other wildlife populations undermines these opportunities. In addition, any reduction of DBS movement between the Soda and Cady Mountains herds with neighboring herds in mountain ranges south of I-15 would certainly decrease these opportunities, and would reduce or eliminate California's citizens hunting opportunities in the region.

California has long been a leader in thoughtful conservation and sustainable development. For example, the California Legislature passed a bill in 2023 which directed the California Department of Transportation to construct the three wildlife overpasses over Brightline West and I-15. This includes one at Soda Mountain, which will protect and enhance DBS and other wildlife connectivity. In addition, the California Transportation Commission subsequently obligated \$99M toward the construction of these overpasses. The private sector (Brightline West) is contributing approximately \$30M towards these crossings. Should the Commission approve this Project, it would directly subvert and contradict these conservation efforts, such as these overpasses, as

well as the larger conservation goals of the California Department of Fish and Wildlife, California Department of Transportation, other State and Federal agencies, Indian Tribes and NGO stakeholders, thus eroding the public's confidence in the Commission's decision-making.

Californians expect renewable energy development to be responsibly sited in locations that minimize the impacts on native wildlife, local communities, and California ecosystems. In this case, responsible means the Commission should reject this Project as proposed and require its relocation to a less sensitive area.

Signatories:

(List of Hunting and Conservation Organizations)

Don Martin, President
California Chapter – Wild Sheep Foundation

Gray Thornton, President & CEO
Wild Sheep Foundation

John Wehausen, President
Sierra Nevada Bighorn Sheep Foundation

Aimee J. Byard, Director of Operations/Biologist
Bighorn Institute

Steve Marschke, President
Society for the Conservation of Bighorn Sheep

Bob Keagy, President
Golden Gate Chapter - Safari Club International

Ryan Bronson, Director of Government Affairs
Rocky Mountain Elk Foundation

Lori Jacobs, President
California Houndsmen for Conservation

Chris Hall, Chief Executive Officer
California Deer Association

Fred Harpster, President
The Black Brant Group

Steve Miller, President
Tulare Basin Wetlands Association

Gary F. Brennan, President
San Diego County Wildlife Federation

Loyal Taylor, President
Cal-Ore Wetland and Waterfowl Council

Ken Akins, President
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Rick Travis, Legislative Director
California Rifle & Pistol Association

Glennon T. Gingo, President
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Mark Hennelly, Vice-President of Government Relations
California Waterfowl Association

Clark Smith, President
San Francisco Bay Area Chapter - Safari Club International

Candi Muse, President
California State Chapter – National Wild Turkey Federation

Chriss Bowles, President
California Bowmen Hunters/State Archery Association